

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

FRANKLIN G. SOTO, ESQ.
BASTARRIKA, SOTO, GONZALEZ &
SOMOHANO, LLP
434 21ST STREET
PATERSON, NEW JERSEY 07513
(973) 977-9919

ATTORNEY FOR CREDITORS, CLAUDIA
MARCELA DUQUE-SALAZAR, GLORIA LILIANA
ZALAZAR-ARBELAEZ AND JOSE FENIBAL
DUQUE-CASTANO

In Re:

EVARISTO BURDIEZ A/K/A EVARISTO BURDIEZ,
JR.,

DEBTOR.

Case No.: 20-23664/VFP

Chapter 13

Judge: Vincent F. Papalia

**APPLICATION FOR THE ENTRY OF A CONSENT ORDER GRANTING LIMITED
RELIEF FROM THE AUTOMATIC STAY**

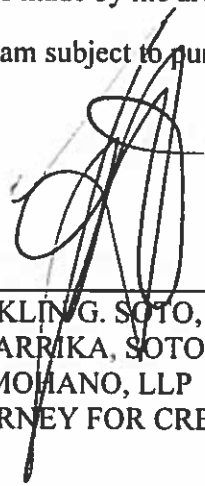
Franklin G. Soto, Esq., of Bastarrika, Soto, Gonzalez & Somohano, LLP, attorneys for the creditors, Claudia Marcela Duque-Salazar, Gloria Liliana Zalazar-Arbelaez and Jose Fenibal Duque-Castano, respectfully represents to the Court as follows:

- 1) I am an attorney-at-law of the State of New Jersey and associated with the firm of Bastarrika, Soto, Gonzalez and Somohano, LLP, attorneys for the creditors in the above-captioned matter.
- 2) The Debtor has agreed to allow the creditors in the above-captioned matter to resume litigation as plaintiffs with respect to the specific performance action filed in the Superior Court of New Jersey, Chancery Division, Bergen County (Docket No. C-000208-20).

- 3) The parties have agreed that the automatic stay instituted upon the filing of the Debtor's petition shall not apply to any action by the above-captioned creditors to pursue the specific performance action; namely the legal matter entitled: "Claudia Marcela Duque-Salazar, Gloria Liliana Zalazar-Arbelaez and Jose Fenibal Duque-Castano v. Cecilia Otero and Evaristo Burdiez, Jr.," Docket No. C-000208-20, filed with the Superior Court of New Jersey, Chancery Division, Bergen County.
- 4) The Creditors respectfully requests that if the proposed Consent Order herewith meets with Your Honor's approval, that Your Honor execute the Order without any further hearing.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

DATED: March 10, 2021



FRANKLIN G. SOTO, ESQ.
BASTARRIKA, SOTO, GONZALEZ
& SOMOJANO, LLP
ATTORNEY FOR CREDITORS